

MCKOOL SMITH HENNIGAN, P.C.  
RODERICK G. DORMAN (SBN 96908)  
rdorman@mckoolsmithhennigan.com  
LAWRENCE M. HADLEY (SBN 157728)  
lhadley@mckoolsmithhennigan.com  
865 South Figueroa Street, Suite 2900  
Los Angeles, California 90017  
(213) 694-1200 - Telephone  
(213) 694-1234 - Facsimile

Attorneys for Plaintiff MEDSQUIRE, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MEDSQUIRE, LLC

Plaintiff,

vs.

SPRING MEDICAL SYSTEMS, INC.;  
QUEST DIAGNOSTICS, INC.;  
NEXTGEN HEALTHCARE  
INFORMATION SYSTEMS, INC.;  
HENRY SCHEIN MEDICAL SYSTEMS,  
INC.; HEWLETT-PACKARD  
COMPANY; APRIMA MEDICAL  
SOFTWARE, INC.;  
eCLINICALWORKS, LLC; MED3000,  
INC.; PULSE SYSTEMS, INC.;  
COMPULINK BUSINESS SYSTEMS,  
INC.; NEXTECH SYSTEMS, INC.;  
NAVINET, INC.; successEHS, INC.;  
athenaHEALTH, INC.

Defendants.

) Case No. CV11-4504-JHN (PLAx)

) **NOTICE OF REQUEST AND**  
) **REQUEST TO ENTER DEFAULT**  
) **AGAINST DEFENDANT NAVINET,**  
) **INC.**

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT, NAVINET, INC.,  
2 AND TO ITS COUNSEL OF RECORD:

3 Plaintiff Medsquire, LLC ("Medsquire") hereby requests that the Clerk of the  
4 above-entitled Court enter default in this matter against defendant NaviNet, Inc.  
5 ("NaviNet") on the ground that said defendant has failed to respond to the Second  
6 Amended Complaint within the time prescribed by the Order of this Court entered  
7 October 25, 2011.

8 As set forth in the accompanying Declaration of Lawrence M. Hadley,  
9 Medsquire served NaviNet with the Complaint on June 2, 2011. On July 18, 2011,  
10 NaviNet appear in the action, through its counsel, John, M. Adams, by filing a Joinder  
11 in a motion to dismiss. After the Court granted the motion to dismiss, and Medsquire  
12 amended the Complaint, NaviNet and the other defendants stipulated with Medsquire  
13 regarding the filing of a Second Amended Complaint ("SAC"). On October 25, 2011  
14 the Court granted the stipulation, and ordered that Medsquire file its SAC on that date.  
15 The Court's Order also directed that each Defendant respond to the SAC on or before  
16 November 8, 2011. In accordance with the Court's Order, Medsquire manually filed  
17 the SAC on October 25, 2011. On October 27, 2011, Medsquire electronically filed  
18 the Second Amended Complaint as stamped "filed" by the Court. On October 27,  
19 2011, the Court's Case Management/Electronic Case Files ("CM/ECF") provided  
20 email notification of the filing of the Second Amended Complaint.

21  
22 DATED: November 10, 2011 MCKOOL SMITH HENNIGAN, P.C.

23  
24  
25 By /s/Lawrence M. Hadley  
Lawrence M. Hadley

26 Attorneys for Plaintiff, MEDSQUIRE LLC  
27  
28